

# McElroy Deutsch

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May 21, 2025

**Via ECF:**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York

USDC SDNY  
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## MEMORANDUM ENDORSED

**Re:** *Arrabito v. First Unum Life Ins. Co. et al.*  
**Case No.:** *1:24-cv-05054-GHW-JW*

Dear Judge Woods:

We represent defendant, First Unum Life Insurance Company in the above matter. We write in accordance with Subsection 1(E) of the Court's Individual Rules of Practices in Civil Cases to request an adjournment of the discovery motion conference currently scheduled for June 5, 2025, and also to request that the conference be held via video conference.

The adjournment is requested because on the date this conference has been scheduled the undersigned is scheduled to work at the polls in connection with the early voting for New Jersey's primary election. New Jersey early voting is June 3 through 8, with the formal election day on June 10. This is our first request for an adjournment of the conference, and plaintiff's counsel, Noah Breazeale, consents to this request. The parties are jointly available on the following **proposed alternate dates: June 18, 24, 25, 30, and July 2.**

Plaintiff's counsel, located in Chattanooga Tennessee, requests that the conference be held via video conference rather than in person. Defense counsel does not oppose this request.

The parties jointly thank the court for its kind consideration of these requests.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

*s/ Louis P. DiGiaimo*


Louis P. DiGiaimo

cc: All counsel via ECF

Application denied without prejudice. The parties' request for an adjournment of the discovery conference, Dkt. No. 35, is denied without prejudice. This case is referred to Magistrate Judge Willis for general pretrial matters and dispositive motions. Dkt. No. 5; *see also* Dkt. No. 25. The parties may renew their request before Judge Willis. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 35.

SO ORDERED.

Dated: May 21, 2025  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge